

1 THE HONORABLE RICARDO S. MARTINEZ
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7 UNITED STATES DISTRICT COURT
8 WESTERN DISTRICT OF WASHINGTON
9 AT SEATTLE

10 HAT TRICK MARINE, LLC, LLC,
11 FEDERAL INSURANCE COMPANY, and
12 ACE AMERICAN INSURANCE
13 COMPANY,

Plaintiffs,

v.

14 COREY TOEDEBUSCH, SARAH BOND, and the
marital community thereof,

Defendants.

16 COREY TOEDEBUSCH, SARA BOND,
17 and the marital community thereof,

Third-Party Plaintiffs,

19 vs.

20 PHILIP CORBIN III, an individual,

21 Third-Party Defendant.

IN ADMIRALTY

CAUSE NO. 2:20-CV-01697 RSM

STIPULATED MOTION AND
ORDER EXTENDING
DISCOVERY DEADLINE

NOTING DATE: SEPTEMBER 22,
2021

23 Pursuant to LCR 7(j), the parties, by and through their counsel of record, move this
24 Court for relief from the discovery deadline to allow the completion of the depositions of
25 defendant Sarah Bond, defense/third-party plaintiff expert Gerard Schaefer, and third-party
26 defendant Philip Corbin III.

27 ATTORNEYS AT LAW

STIPULATED MOTION AND ORDER
EXTENDING DISCOVERY DEADLINE - 1

No.: 2:20-CV-01697

BAUER MOYNIHAN & JOHNSON LLP
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1 **Motion to Extend Discovery Deadline**

2 The parties to this matter have been diligently pursuing discovery including the
3 exchange of written discovery and expert reports. The parties have taken the depositions of
4 seven designated witnesses. In addition to the discovery to date, the parties have been
5 working to arrange the depositions of three additional individuals, defendant Sarah Bond,
6 defense/third-party plaintiffs' expert Gerard Schaefer, and third-party defendant Philip
7 Corbin. Due to conflicts in attorney and witness work schedules including a recent
8 unanticipated interruption caused by an attorney being called into trial, the depositions of
9 Bond, Schaefer, and Corbin will not be able to be completed by the October 4, 2021 discovery
10 deadline. The parties and witnesses have agreed that the depositions of Bond and Schaefer
11 can occur on October 7, 2021 and the deposition of Corbin can occur on October 12, 2021.

12 Good cause exists for relief from the discovery deadline to allow completion of the
13 depositions. The parties have been working diligently to arrange the depositions and the
14 inability to complete the discovery is not due to any individual fault but to the complexities of
15 accommodating the schedules of attorneys and witnesses. Extension of the discovery
16 deadline is requested solely to complete the depositions of the aforementioned individuals,
17 which the parties agree have discoverable and relevant information related to their claims and
18 defenses. Therefore, the parties respectfully request this Court grant relief from the discovery
19 deadline for the purposes of holding the depositions Sarah Bond, Gerard Schaefer, and Philip
20 Corbin III.

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27 ATTORNEYS AT LAW

STIPULATED MOTION AND ORDER
EXTENDING DISCOVERY DEADLINE - 2

No.: 2:20-CV-01697

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1 Dated this 22nd day of September, 2021.
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43 STIPULATED MOTION AND ORDER
44 EXTENDING DISCOVERY DEADLINE - 3
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46 -
47 No.: 2:20-CV-01697
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ORDER

It is so ordered.

DATED this 24th day of September, 2021.



RICARDO S. MARTINEZ
CHIEF UNITED STATES DISTRICT JUDGE

**STIPULATED MOTION AND ORDER
EXTENDING DISCOVERY DEADLINE - 4**

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